

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CARLA BEEN,)	
)	
Plaintiff,)	
v.)	Cause No. 4:19-cv-02836-RLW
)	
SUNSHINE CLEANERS PLUS, INC.,)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR LEAVE TO FILE A SUR-REPLY BRIEF IN
OPPOSITION TO PLAINTIFF’S MOTION FOR REMAND**

COME NOW Defendant, by and through its undersigned counsel, and for its Motion for Leave to file a Sur-Reply Brief in Opposition to Plaintiff’s Motion for Remand [Doc. 6], states as follows:

Local Rule 4.01(C) provides that additional memoranda beyond (i) a memorandum in support of a motion, (ii) the memorandum in opposition to the motion, and (iii) the reply memorandum, may only be filed with leave of Court. Based on the broad scope of the issues raised by the parties in connection with these three pleadings, Defendant respectfully requests the Court to grant it leave to file a Sur-Reply brief, a copy of which is attached hereto as **Exhibit 1**.

WHEREFORE, Defendant respectfully requests the Court to permit it to file a Sur-Reply brief in Opposition to Plaintiff’s Motion for Remand, to deny Plaintiff’s Motion for Remand, to deny Plaintiff’s request for attorneys’ fees that she incurred in connection with the Motion for Remand, and for such other and further relief as the Court deems just and appropriate.

McCARTHY, LEONARD, KAEMMERER, L.C.

BY: /s/ Bryan M. Kaemmerer
Michael E. Kaemmerer, #25652 (MO)
mkaemmerer@mlklaw.com
Bryan M. Kaemmerer, #52998 (MO)
bkaemmerer@mlklaw.com
825 Maryville Centre Dr., Ste. 300
Town & Country, MO 63017
Phone: (314) 392-5200
Fax: (314) 392-5221

Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2nd day of December 2019, the foregoing was filed electronically with the Clerk of Court, therefore to be served electronically by operation of the Court's electronic filing system upon all parties entitled to notice.

/s/ Bryan M. Kaemmerer